

CONFIDENTIAL

II. EMPLOYMENT

Equal Employment Opportunity /Workplace Harassment Policy

It is the policy of the Company that employment shall be based on merit, qualifications, and competence and that employment decisions shall be made without regard to an applicant's or employee's race, creed, color, national origin, sex, age, disability, marital status, sexual orientation or citizenship status in all employment decisions, including but not limited to recruitment, hiring, compensation, training and apprenticeship, promotion, upgrading, demotion, downgrading, transfer, lay-off and termination, and all other terms and conditions of employment in accordance with applicable federal, state and local laws.

A. Zero Tolerance for Harassment

The Company has adopted a policy of "zero-tolerance" with respect to unlawful employee harassment. The Company will not tolerate, condone or allow harassment, whether engaged in by management, fellow employees, supervisors, customers, or other non-employees who conduct business with the Company. In this connection, the Company expressly prohibits any form of unlawful employee harassment based on race, color, religion, sex, creed, sexual orientation, national origin, genetic predisposition or carrier status, marital status, citizenship status, age, disability or status in any group protected by state or local law. Improper interference with the ability of the Company employees to perform their expected job duties is not tolerated.

B. Prohibition of Sexual Harassment

With respect to sexual harassment, The Doe Fund prohibits the following:

1. Unwelcome sexual advances, requests for sexual favors, and other verbal, written or physical conduct of a sexual nature or otherwise offensive, especially where: (a) submission to such conduct is made a term or condition of employment; (b) submission to or rejection of such conduct is explicitly or implicitly the basis for employment decisions; or (c) such conduct unreasonably interferes with the individual's work performance or has the purpose or effect of creating an intimidating, hostile, or offensive work environment.
2. Offensive comments, jokes, innuendoes, and other sexually oriented statements.

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Examples of the types of conduct expressly prohibited by this policy include, but are not limited to, the following:

- Touching, such as rubbing or massaging someone's neck or shoulders, stroking someone's hair, or brushing against another's body.
- Sexually suggestive touching.
- Grabbing, groping, kissing, fondling.
- Violating someone's "personal space".
- Whistling.
- Lewd, off-color, sexually oriented comments or jokes.
- Foul or obscene language.
- Leering, staring, stalking.
- Suggestive or sexually explicit posters, calendars, photographs, graffiti or cartoons.
- Unwanted or offensive letters or poems.
- Sitting or gesturing sexually.
- Offensive E-mail or voice-mail messages.
- Sexually oriented or explicit remarks, including written or oral references to sexual conduct, gossip regarding one's sex life, body, sexual activities, deficiencies, or prowess.
- Questions about one's sex life or experiences.
- Repeated requests for dates.
- Sexual favors in return for employment rewards, or threats if sexual favors are not provided.
- Sexual assault or rape.
- Any other conduct or behavior deemed inappropriate by the Company.

C. Complaint Process

Each employee of The Doe Fund is responsible for creating an atmosphere free of discrimination and harassment, sexual or otherwise. At the Company, we believe this is best accomplished when all employees are responsible for respecting the rights of their co-workers, program participants and all other individuals.

If you experience any job-related harassment based on your sex, creed, color, citizenship status, race, national origin, disability, age, sexual orientation, marital status, or another factor, or believe you have been treated in an unlawful, discriminatory manner, promptly report the incident to your supervisor, who will investigate the matter and take appropriate action, including reporting it to the Director of Human Resources.

If you believe that it would be inappropriate to discuss the matter with your supervisor, you may bypass your supervisor and report it directly to the Human Resources Department, which will undertake an investigation. Your complaint will be kept confidential to the maximum extent possible.

If The Doe Fund determines that an employee is guilty of harassing another individual, appropriate disciplinary action will be taken against the offending employee, up to and including termination of employment.

The Doe Fund prohibits any form of retaliation against any employee for filing a bona fide (valid) complaint under this policy or for assisting in a complaint investigation. However, if, after investigating any complaint of harassment or unlawful discrimination, the Company determines that the complaint is not bona fide and was not made in good faith or that the employee has provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the complaint or who gave the false information.